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Special Operations OPSEC Political Committee
PO Box 1076
Alexandria VA 22313

OFFICE OF GENERAL
COUNSEL

Federal Election Commission
Office of Complaints Examination and Legal Administration
Attn: Mary Beth deBeau, Paralegal
999 E Street NW
Washington DC 20436

RE: MUR 7084

To whom it may concern:

Two of the allegations made by Ms. Clarkson deal with the Special Operations OPSEC Political Committee ("the Committee"). Before proceeding to respond to Ms. Clarkson's allegations, I briefly review the history of the long-terminated organization.

The Committee was incorporated as a tax-exempt Delaware corporation on August 1, 2012, under the name Special Operations OPSEC, Inc. On August 6, 2012, it amended its certificate of incorporation to change its name to Special Operations OPSEC Political Committee, Inc.

The Committee filed form 8871 with the Internal Revenue Service on August 6, 2012, disclosing its initial officers— Frederick W. Rustman, Jr., president; Joe Hough, secretary; and Michael Smith, treasurer. As required, the Committee filed its periodic Reports of Contributions and Expenditures on Form 8872. The Committee filed an amended Form 8871 notifying the IRS that James M. Williamson replaced Michael Smith as Treasurer. The Committee filed its final Form 8872 on February 28, 2013, terminating its existence. No allegation has been made that it failed to follow the requirements of the Internal Revenue Code.

Pursuant to the Act, the Committee also filed independent expenditure reports with the Commission under Committee ID C90013368. The Committee filed notices of its Independent Expenditures on September 14, 2012, and November 2, 2012. It also filed quarterly reports. The Commission sent the Committee several requests for additional information. The Committee responded completely to each in the timeframe requested. At no time did the Committee qualify as a political committee under the Act.

The Commission requested no additional information and the Committee had no further obligation to report as it made no independent expenditures after November 2, 2012.

Having reviewed the Committee's history, I turn now to Ms. Clarkson's allegations.

In item III, Clarkson alleges that Delegate Taylor, "as the controlling member of several political committees" ignored federal law and failed to comply with the Act's reporting requirements, specifically alleging reporting failures by the Committee citing as evidence the Commission's requests for additional information and the lack of any reports covering any periods beyond February 28, 2013.

In Item IV, Clarkson repeats her allegations regarding Delegate Taylor's connection to the Committee and further alleges a failure to comply with fundraising guidelines. To the extent that this item states a different claim than item III, Clarkson provides no evidence relating to any fundraising activity by the Committee after its termination or with respect to Delegate Taylor.

At no time was Delegate Taylor an officer of the Committee and certainly not the person completing FEC Form 5 or the custodian or contact person for Form 8872 who, in their official capacities, are the individuals responsible for compliance with the Act and the Internal Revenue Code.

Further, as described above, the Committee filed its reports and timely responded to all requests for additional information from the Commission.

As such, the Commission should not find reason to believe that a violation has occurred and should take no action with respect to Ms. Clarkson's allegations against the Committee.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris. Marston", with a stylized flourish at the end.

Christopher M. Marston,
Counsel